



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

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Molly Joseph Ward  
Secretary of Natural Resources

David K. Paylor  
Director

(804) 698-4000  
1-800-592-5482

May 18, 2015

### VIA ELECTRONIC MAIL

Mr. Jay Stewart  
Environmental Manager  
BAE Systems, Ordnance Systems, Inc.  
Radford Army Ammunition Plant  
4050 Pepper's Ferry Road  
Radford, Virginia 24141

**Re: RFAAP Incinerator Permit Application Second NOD Response – Acknowledgement  
of Receipt and Response Review  
Radford Army Ammunition Plant, Radford, VA  
EPA ID No. VA1210020730,**

Dear Mr. Stewart:

The Virginia Department of Environmental Quality (DEQ) has received the *RFAAP Incinerator Permit Application 2nd NOD Response* document dated May 15, 2015, associated with the Radford Army Ammunition Plant (RFAAP) located in Radford, Virginia. The Second Notice of Deficiency (Second NOD) Response document was received by the DEQ via electronic mail on May 18, 2015. The DEQ's hazardous waste permitting staff has reviewed the Second NOD Response document and concurs with the responses provided by RAAP.

As the identified application deficiencies have been resolved RAAP is required to respond with an updated RCRA Part B permit application which incorporates the additional information and/or documentation which was identified in the Second NOD within 30 days from the date of this letter, June 17, 2015.

RAAP has stated in their Second NOD Response document that response for some of the issues raised in the NOD may require 90 to 120 days to complete the applicable section updates and compile the necessary information for permit application. For these items RAAP may request 30 day extensions from DEQ for submission of these updated sections of the permit application, provided a status update of RAAP's progress in revising the application sections is also provided with the extension requests.

Mr. Jay Stewart

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For the sake of ensuring a timely review and processing of the permit application DEQ is requesting that any updated sections of the application which have been completed by RAAP be submitted for review when they are finished instead of waiting for all sections of the application to be finished before submittal. This will ensure the deficiencies raised in the previous NOD's have been adequately addressed and the permit can be finalized in a timely fashion.

If you have any questions regarding the information in this correspondence, please contact me at (804) 698-4467 or by e-mail at [Ashby.Scott@deq.virginia.gov](mailto:Ashby.Scott@deq.virginia.gov).

Sincerely,

A handwritten signature in black ink, appearing to be 'Ashby Scott', written in a cursive style.

Mr. Ashby Scott  
Hazardous Waste Permit Writer  
Office of Waste Permitting and Compliance

cc: Central Hazardous Waste Files  
Andrea Barbieri, EPA, Region III (3LC50)  
Aziz Farahmand, DEQ, Blue Ridge Regional Office  
Leslie Romanchik, Russ McAvoy, Jutta Schneider, Kurt Kochan, DEQ, CO  
  
Jim McKenna, Radford Army Ammunition Plant